

Exhibit G

From: Mark Higgins
To: Jim Simon; Suki Dardarian; Nancy Hawman
Sent: 4/16/2010 4:45:43 PM
Subject: Mark Rahner

Folks,

I talked to Mark R. and Matt this afternoon. Here's a very condensed version:

I told Mark the basics: that as a GA reporter I need him to start his day here in the office and by about 9 a.m., give or take. I explained why it's important to have him available, given his assignment. I also talked to him about doing enterprise work and that we are always open to his story ideas, etc.

He said he still suffers from chronic fatigue and is still getting medical help for it. He says he would rather just come in when he's ready and work until he's done, and that's how he says he did it in features without any problem. He said some days/weeks he worked more than 8/40 hours and other weeks less than that but he didn't really care one way or the other: he just did the work.

I told him fine but that's not how Metro works and that's not what works for me or the Metro Desk.

I said that if he has a medical condition that limits the hours in a day or week that he can work, he should take the next step and talk to you, Nancy, about intermittent FMLA. I didn't push that as an option, but I he may follow up and ask to talk to you about how it works.

Again, it's not clear to me whether he can't work 40 hours a week, or he just can't get up in the morning. He repeatedly suggested that we shouldn't try to put a round peg in a square hole. He also is talking with Dave next week and I told him that if he has ideas about the kind of work he wants to do, we'll hear him out. Right now, I told him, I need him to be a ga reporter.

Mark

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Exhibit H

The Seattle Times

Performance Evaluation for Mark Rahner 2010 Supervisor Evaluation

Employee:	Rahner, Mark W	Position:	Reporter
Supervisor:	Kreamer, Matt	Dept / Cost Center:	Local Desk / 4230
Guild Classification:	A/3-6	Date Reviewed with Manager:	

Please answer the following questions:

1. What are the top priorities of this employee's job?

Mark, having left Features in late 2008, you're now working as one of Metro's general-assignment reporters responsible for breaking news or other daily stories, as needed, and for coming up with your own enterprise ideas.

You also have produced videos for seattletimes.com, and have continued writing Q&A features, which you did in your former role.

As a Metro general assignment reporter, we expect you to:

- Understand your role in the newsroom, be available for assignments, pay attention to the daily flow of news and volunteer to help out if there's a big story breaking.
- Help us break news first on the Web and then, if needed, write through the story for tomorrow's newspaper.
- Work well with Photo, Graphics, Online producers and with other departments.
- When not writing daily stories, help us identify fun, interesting, off-the-news enterprise stories that you can pursue as time is available.
- Share your experience and knowledge and help inform the daily newsroom conversations on developing news stories.
- Be accurate, follow the Times' CQ policy, checking all facts, keep stories fair, well-balanced and avoid personal biases and stereotype. Be proficient in spelling and grammar.
- Be professional when readers call with questions or complaints, and when you are out in the community on story assignments
- Meet deadlines.

2. What achievements of the past year reflect those priorities?

Mark, you wrote about 55 byline stories in the past year, and produced eight videos. During the first few days of the Maurice Clemmons story you worked an overnight shift and were the only reporter on duty when Clemmons was shot and killed by a Seattle Police officer. You used Twitter to break the news and then continued reporting as the news unfolded, which is exactly what we expect from you. You did well on this story.

Your feature story about the Seattle Semipro wrestling troupe and its disagreement with the state about whether they performed as actors or athletes was a very good read. And it had a great video to go with it. More recently, during the legislative session you have taken on the medical marijuana as a mini-beat, and you seem genuinely interested in helping us shape our coverage on the issue.

Your Q&As along the way have included interviews with experts on economics, child obesity and the brain's response to the digital age, as well as the Seattle Weekly's Uptight Seattleite.

Some of your videos were especially fun for readers and viewers, but the process and time involved by you and other staff proved to be a hindrance, so they were put on hold.

Perhaps your best video work was done on the spat between PETA and the Pike Place Fish Market, famous for tossing the dead fish. Others notable efforts included a look at our fondness for all things bacon and the Twilight craze.

3. Based on the core skills for this job, what are the employee's strengths? What has the employee done to improve his/her skills?

Mark, you are a solid and capable writer, and a good reporter – especially when you're motivated. When we asked you to work a breaking news story, such as the Maurice Clemmons story, you stepped up and performed, meeting our expectations.

You sought out some in-house training on video production and then took it upon yourself to learn more about mastering the scripting, shooting and editing.

4. Based on the core skills for this job, how could the employee improve?

Mark, there are a few main areas in which you need to show improvement:

Story development and story-idea generation

You have neither have embraced your current role nor done what was asked of you in your effort to create a new role. We have asked for your best ideas, and then not seen much happen on your end. We invited you to put in a story proposal to travel to Los Angeles to do a story on how California is handling the medical marijuana issue. But you didn't follow through.

You rarely suggest story ideas or volunteer to help, and instead sit back waiting for an assignment. But when you do get an assignment, you often don't show initiative if it isn't something that interests you. You have struggled with even writing obituaries, and contacting people who might be in distress over the loss of a loved one or a traumatic event, which is part of the role and expectation of a general assignment reporter. In one instance, when we asked you to write a news obituary for one of the four murdered Lakewood officer, you refused, and we had to have another reporter do that work.

Productivity and accountability

Mark, another area of concern is your resistance to and sometime refusal to accept many of the basic tenets of working in this newsroom: collaboration, respect for colleagues, accepting guidance from Web and photo staff, following directions from your superiors, abiding by basic rules and procedures.

In pursuit of some of the videos you produced, the Web staff complained that you ignored their repeated pleas to edit videos tighter, and to secure permissions for outside clips and photos, and the result was that the process became too burdensome to continue. Your expense card was taken away because you continually refused to submit your receipts as requested.

Writing tone

The humorous approach you take with some assignments can be off key. You sometimes struggle with news assignments or at times try to make them more feature-y or funny than you should, examples include the story about the Port Orchard mayor's DUI and the NOOD regatta.

Punctuality

You have been reminded of this numerous times and have continued to arrive nearly two hours after your posted start time, on average, without notifying a supervisor. As a GA reporter, it is important to be at your desk at your appointed start time in order to be available for assignments.

5. Here are goals from the last review. Were they accomplished, and if so, how?

N/A. Your most recent review was August 2005.

Story development and story-idea generation

We need you to be more proactive, looking into the community for your own story ideas. You have a lot of leeway as a general-assignment reporter to come up with ideas that interest you also and serve the needs of the community and the newspaper. But you need to go find them.

Just as important, whether stories are assigned or self-discovered, we need you to have a greater urgency in thoroughly developing them and getting them done in a timely manner.

You should expand your use of the Q&A format; you typically interview authors and would do well to also focus on local newsmakers in a timely way. We had discussed making those a regular feature on the local cover, but you have not generated them on a regular basis.

Productivity and accountability

We need you to be more productive. You should be writing – as a general goal – three stories a week on average, with a mix of enterprise, Q&As and assigned news.

More importantly, your talents seem well-suited to producing short-term, A1 enterprise. You spent a long time as a feature writer, and we would welcome from you compelling feature package. You should strive for two or three A1-worthy enterprise stories each month, as other general assignment reporters do.

In addition, you need to work to better understand the roles other departments have in the production of the newspaper and website. Not working well with the web staff, and essentially ignoring their needs, led to a moratorium on your videos. That was unfortunate, and could have been prevented with better communication and a willingness to take direction.

Writing tone

Your writing needs to be appropriate to the story. You have a good sense of humor, but you try to force humor or pop culture references into too many stories, often inappropriately. You need to take greater care to make sure the tone of your stories is appropriate, especially on news stories.

Punctuality

You need to improve your punctuality, coming to work on time so you're available for morning assignments. You are expected to be at your desk between 9 a.m. and 9:15 a.m. Late arrivals are not acceptable, but if there are occasions when you know you will be late, it is important to call and let your editor know. A continued pattern of tardiness will lead to formal discipline.

Other Comments:

Mark, we think you are a talent reporter who could bring a lot to the pages of the newspaper and our Web site, but need to improve your relationship to your colleagues and step up your commitment to the newspaper's mission to serve the community through quality journalism -- and try your best at whatever role you're in.

You have had several conversations with your supervisors -- including Mark Higgins and Dave Boardman -- about your thoughts on working here at The Times and what we expect of you. We need you to step up to the challenges.

Manager Signature:

Date:

Employee Signature:

Date:

Department Head Signature:
Date:

Date:

Human Resources Signature:

Exhibit I

From: Suki Dardarian
To: Jim Simon; Mark Higgins
Sent: 5/28/2010 2:05:55 PM
Subject: RE: Rahner on nights

Also agreed on Rahner.

From: Jim Simon
Sent: Friday, May 28, 2010 11:49 AM
To: Mark Higgins; Suki Dardarian
Subject: RE: Rahner on nights

Thanks, Mark

I concur with the thinking on Mark.

One other thing we might want to think about in the fall is having Nancy or Sonia perhaps, do a Saturday or Sunday shift. That would significantly reduce the number of weekend rotations for reporters. Reducing those shifts would make a big difference in how we could use our most productive reporters.

Jim

From: Mark Higgins
Sent: Friday, May 28, 2010 11:32 AM
To: Suki Dardarian; Jim Simon
Subject: Rahner on nights

Suki, Jim:

This night shift rotation needs to come to an end. I recommend we ask Mark Rahner to take on the job for at least six months, with the possibility of extending the assignment permanently.

Part of my thinking is the upcoming need to shift Lynn T. to higher ed to backfill for Nick Perry. That would mean we would have to put someone in Snohomish County. Maybe Nicole T? Or Nancy Bartley? As we make these changes we lose further options for the night shift. I think it was OK to rotate it for awhile, to buy us more time, but trying to keep it going indefinitely makes that really hard.

Any thoughts/objections? If not, will you please tell Dave that's where I am heading with it. Mark will run to him faster than you can imagine once I drop the hammer.

Mark's new assignment would begin Sept. 1 or thereabouts.

Mark

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From: Jim Simon
To: Mark Higgins; Suki Dardarian
Sent: 6/8/2010 4:53:15 PM
Subject: RE: Mark Rahner/update

Mark -- Thanks for the note. I'm entirely in synch with you. I think now we've reached a point of clarity -- he acknowledges not wanting to be in Metro and we don't think he's providing much value. In other words, both sides concede he's a lousy fit. I'm dubious that any reconfiguration of his job will provide a real payback for us at a time when we need everyone to step up to the plate. Several times we've given him opportunities -- encouraging q and a's and videos, offering him a chance to play in the Olympics coverage -- and he's never shown any real initiative. We owe him a conversation about what his future will look like -- most likely, nights. Then he needs to make a decision whether to stay.

Jim

From: Mark Higgins
Sent: Tuesday, June 08, 2010 4:32 PM
To: Jim Simon; Suki Dardarian
Subject: Mark Rahner/update

Wanted to bring you up to speed in advance of our meeting with Dave on the 17th -- that's when we're sked to meet about Rahner.

As a walk up to Mark's performance review, Matt had coffee with him and told him that, basically, he's not meeting expectations. Matt sent me a draft review and I sent it back to him for revisions. I'm hoping to get it to you later this week for review and before Matt gives it to Mark.

In his talk with Matt, Mark again reiterated the point that he's unhappy in Metro and that he was continuing to talk to Cory (!) about doing some kind of pop culture-like blog or job online. Who knows what that's about.

Matt told Mark that for now he needs to bring us his story ideas within the framework of his job as a ga reporter.

I had a similar conversation with Mark and Matt about a month ago. At that time Mark said he wanted to go to LA and do a pot story looking at California law and what's happening here in Washington state. I said, great. Give me a proposal. He never followed through. I also told Mark that he needs to bring his best ideas forward.

Anyway, Mark then told Matt about his recent conversation with Dave. He says Dave gets that Metro may be the wrong place for him/or that Mark may be better suited for some other type of job. I guess Mark left his meeting thinking that Dave has his back. Or at least that's what he's saying to Matt.

The reason I bring this up now is that unless there's another option, I'd like to ask Mark to work nights for awhile starting in September. I'm guessing he may pitch a fit.

My request here is that we get a final answer out of our meeting with Dave about Mark. If you or Dave think that it would be a waste to put Mark on nights, fine, let's take it off the table. But you have to understand that we have only so many hours in the day to try to get Mark to do some real work for us. And I have few options, if any, on nights right now.

I'm also tired of chasing this issue around the block....and I'm guessing you all feel that way.

Mark

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Exhibit J

JOB TITLE:	Reporter
POSITION REPORTS TO:	Supervising Editor
DEPARTMENT:	News
SUBDEPARTMENT:	Metro, Business, Sports, Newsfeatures, A&E and Scene
FLSA:	Not Exempt
NLRB:	Guild Class A3
DATE:	December 1, 1999

GENERAL SUMMARY

To plan, gather, evaluate, select and write material relating to topics assigned.

MAJOR FUNCTIONS

1. Prepare accurate, fair, balanced and carefully researched stories to meet assigned deadlines. Seek a variety of sources in covering a story.
 2. Seek out and act quickly on story opportunities. Aggressively follow through on stories.
 3. Write clear, well-focused and well-organized stories. Handle a variety of stories and writing approaches. Write clear, appropriate leads. Write with authority based on clear understanding of topic or beat. Self-edit for crisp, clean copy. Use good interview techniques and effective quotes.
 4. Develop sources of continuing stories. Maintain a steady flow of ideas and stories. Produce enterprise stories and stay ahead of stories by anticipating or uncovering developments. Consistently suggest ideas for stories, photographs and illustrations. Seek diversity in coverage.
 5. Use documents effectively. Know and effectively use library and computer systems.
 6. Understand how the newsroom operates and work collaboratively and effectively within its teams and organization. Keep supervisor and other appropriate people informed of schedules, work in progress, problems and changes. Maintain good staff communication and relationships. Share knowledge and ideas with other staffers.
 7. Respond constructively to direction, suggestions and criticism.
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8. Be punctual. Organize time well and work on more than one task at a time when necessary.

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9. Demonstrate willingness to perform routine but necessary duties. Be willing to travel and work unusual schedules when news coverage demands it.
10. Keep well-informed about news in general and assigned specialties by reading The Times and other publications. Offer suggestions for improving the newspaper.
11. Seek fresh ideas and approaches in reporting and writing. Keep technological skills current. Take on new challenges. Be willing to take leadership of a story or project.
12. All other duties as assigned.

JOB SPECIFICATIONS

Education: Bachelor's degree.

Experience: Five years of reporting experience, preferably on a daily newspaper.

Skills and abilities: Excellent grammar and language skills. Typing and basic computer skills. Analyze facts to make judgments about relevance, newsworthiness, fairness, etc., under pressure and on deadline. The ability to write clear, accurately and creatively.

Contact with others: Extensive contact with the public. Constant contact with supervisors and with peers.

Work direction over others: None

Supervision received: Must work independently but know when to inform or seek direction from supervisor or other editors.

Pressure of work: High expectations for judgment about the information important, relevant, useful and interesting to readers. Must meet fast-paced deadlines. Must be accurate.

Scope: Use judgment to ensure a fair, balanced and complete report. Accept responsibility for helping to ensure the overall quality of news content.

Impact: Responsible for the quality of his or her own work as well as the news reputation of The Seattle Times. Represents the newspaper to sources and to the public. Errors could result in embarrassment, financial loss or legal action against the newspaper.

Working conditions: Office can be noisy and job has frequent interruptions. Requires ability to travel to events and sources, and to gather information from documents and database. Individual ergonomic adjustments must be made to prevent RSI.

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Job Description

The above statements are intended to describe the general nature and level of work being performed by persons assigned to this job. They are not intended to be an exhaustive list of all responsibilities, duties and skills required.

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